

OFFICE OF SCIENCE (SC) ARGONNE SITE OFFICE (ASO) STANDARD OPERATING  
PROCEDURE (SOP)-21: **PRICE ANDERSON AMENDMENTS ACT (PAAA)**  
**COORDINATION**

**A. OBJECTIVE:**

Safety oversight of ANL is a primary responsibility for the ASO. This SOP establishes and describes the Argonne Site Office (ASO) program for oversight of the Argonne National Laboratory (ANL) processes used to implement the requirements of the PAAA program. This SOP should be used in conjunction with the ASO Environment, Safety and Health (ES&H) Program Plan which defines the ASO ES&H oversight program in accordance with DOE Policy 450.4, Safety Management System Policy.

**B. SCOPE:**

This procedure applies to ASO personnel at Argonne National Laboratory.

**C. REFERENCES:**

1. EH-10 PAAA Procedure "Enforcement Program Roles and Responsibilities Guidance Handbook"
2. EH-10 PAAA Procedure "Identifying Reporting and Tracking Nuclear Safety Noncompliances"
3. EH-10 PAAA Procedure "Operational Procedures for Enforcement"
4. 10 CFR 820 - Procedural Rules for DOE Nuclear Activity (08/17/1993) includes Appendix A, as amended 10/08/1997
5. 10 CFR 820 Amendment - Amendment of Enforcement Policy Statement and Confirmation of Interim Rule 03/22/2000
6. 10 CFR 835 Occupational Radiation Protection: Final Rule 11/04/1998
7. 10 CFR 830 Nuclear Safety Management Final Rule, dated January 10, 2001
8. ASO ES&H Program Plan

**D. RESPONSIBILITIES:**

1. Manager, ASO
  - a. Designate the ASO PAAA coordinator and back-up coordinator.
  - b. Maintain communication with the Office of Science and the Laboratory Director and the DOE-ASO PAAA Coordinator on PAAA concerns.
2. ASO PAAA Coordinator
  - a. Maintain ongoing communication with the Laboratory PAAA Coordinator regarding the status of Nuclear Safety Rule implementation by ANL.
  - b. Maintain consistent and open communication with EH-10 on potential noncompliance reports, progress of corrective actions and input on the Laboratory's PAAA reporting and tracking of PAAA issues, changes in Rules and other issues relevant to the PAAA program.
  - c. Seek input from EH-10 staff, when necessary, on interpretations of Rules, procedures and other matters relative to PAAA reporting.
  - d. Advise the Manager promptly of issues that may develop into potential nuclear safety Rule noncompliances.
  - e. Oversee ANL implementation of PAAA procedures<sup>1</sup> including reviewing, reporting, and tracking of potential rule noncompliance issues, and causal analysis and corrective action development and implementation.
  - f. Monitor the adequacy of the Laboratory process for trending and tracking issues that are clearly below the threshold for reporting on the DOE Noncompliance Tracing System (NTS). These issues should be trended and evaluated periodically for reporting on the NTS noncompliance tracking system.

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<sup>1</sup> Laboratory identification procedures should include issues self-identified by workers, and the broad range of contractor internal review reports, external reviews and occurrence reports. Reference 2 provides detailed guidance on reporting. The Laboratory should also have effective systems established to assist Laboratory employees in understanding PAAA Rule requirements and their roles in implementing the requirements within the Laboratory, particularly with regard to reporting potential noncompliance issues.

- g. Review ANL noncompliance reports including initial submittals and updates. Identify any concerns to the Laboratory PAAA Coordinator for resolution.
  - h. Verify closure of actions resulting from potential rule noncompliances identified by ANL in the DOE NTS. Verify that corrective actions have been implemented as stated. A minimum of 50% of the stated corrective actions should be verified.
  - i. Maintain records on verification activities and supporting documentation.
  - j. Provide input to the Laboratory-closed NTS reports on the DOE NTS as soon as the verification activities are complete, but no later than 60 days following closure of the last remaining corrective action.
  - k. Serve as the primary ASO contact with EH-10 regarding potential nuclear safety issues, including enforcement actions.
  - l. Review ANL's program of triennial radiological assessments for adequacy.
  - m. Ensure that the Laboratory maintains current documentation on file with the EH-10 Docket Clerk.
  - n. Review draft correspondence such as program review reports, enforcement letters and preliminary notices of violation as requested by EH-10. Provide prompt feedback, maintaining confidentiality as specified by EH-10. Most draft correspondence is only for DOE and NOT for the contractor. Distribution for review must be carefully limited.
  - o. Participate as requested by EH-10 or DOE-ASO Management in enforcement activities such as EH-10 site visits and/or requests for information, EH-10 program reviews, and enforcement conferences.
3. ASO PAAA Coordinator Back-up
- a. Maintain current awareness of PAAA Coordinator activities.
  - b. Fill-in for the PAAA Coordinator as needed.